

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

**NO. 2:19-CR-016  
JUDGE MARBLEY**

**MICHAEL ALLEN MARSHALL**

**GOVERNMENT'S SENTENCING MEMORANDUM**

The United States submits that the probation officer has calculated the advisory guideline sentencing range in the defendant's case as being 33-41 months based on a Total Offense Level 13 and Criminal History Category VI. The probation officer has recommended a sentence of 33 months and a 5-year term of supervised release. The government concurs with the probation officer's recommended sentence.

The analysis of the factors to be considered by the Court in determining if a sentence is sufficient but not greater than necessary to satisfy Congress' sentencing mandate, justifies a sentence within the advisory guidelines. The defendant is a 33-year-old male who participated in the production of counterfeit money. As the PSIR offense conduct revealed that the defendant was well versed in the production of counterfeit money. This was not his first trip to the rodeo. The defendant was prepared to produce numerous \$100 counterfeit bills until he was tipped off to the identity of the undercover officer.

A sentence of 33 months is adequate to reflect the seriousness of the offense, promote respect for the law and provide just punishment. Clearly, this sentence will still provide adequate deterrence to others who may consider producing and possessing counterfeit money. Therefore,

the United States submits that a sentence of 33 months and a 3-year term of supervised release would be reasonable under the rationale of *United States v. Booker*, 543 U.S. 220 (2005) and *United States v. Gall*. This sentence will also satisfy the sentencing factors of 18 U.S.C. §3553(a).

Respectfully submitted,

BENJAMIN C. GLASSMAN  
United States Attorney

s/David J. Bosley

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Sentencing Memorandum was served this 13th day of June, 2019, electronically on: George Chaney, attorney for defendant.

s/David J. Bosley

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DAVID J. BOSLEY (0023460)  
Assistant United States Attorney